

Condominium and Homeowners Associations Impact of Delinquencies and Foreclosures

Office of Consumer Protection

1/28/2010

Meeting Goal

Goal: Determine spectrum of impacts related to foreclosures and assessment delinquencies in common ownership communities

Follow-up Item from 11/9/2010:

- Schedule meeting on Homeowners' Associations (HOAs). Office of Consumer Protection will be the lead department involved.
 - Responsible parties: CountyStat, OCP
 - Other parties involved: DHCA
 - Deadline: 11/19/2010



Agenda

- **Meeting Goal**
- **Review of past work**
- **Condo and Homeowner Associations in Montgomery County**
 - Overview
 - Market Statistics
 - MC311 Data
- **Foreclosures and delinquency**
 - Delinquency in paying COC assessments
- **Government Role in Assessments and Collections**
- **Recommendations**



Review of past work

This issue has been reviewed in CountyStat in past foreclosure meetings

- **3/10/2009 CountyStat meeting**

- Ability of homeowners to pay assessments for community-provided services and the resulting impact on the community
- Avenues to collect delinquent assessments
- Vulnerability of older condo communities with commonly metered utilities
- Survey Monkey Survey administered by CCOC yielded limited results (56 responses out of 900+ communities)
- CCOC actions regarding foreclosures and delinquent assessment payments



Source: 3/10/2009 CountyStat Meeting

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Condo and Homeowner Associations in Montgomery County

Licensed Common Ownership Communities

Year	Communities	Housing Units
2006	833	116,532
2007	852	118,248
2008	905	121,101
2009	958	122,142
2010	971	123,129
2011*	1,002	125,706
%Change (2006-10)	17%	6%
Average Community Size = 131 units Range = 2 units-1,578 units		

*Note: Although Rockville voted to include their COC within this jurisdiction, not all of their COCs have registered. There are about 7,000 Rockville units, but only about 1,000 have registered so far. Therefore, the 125,706 Housing units for 2011 does not yet reflect all the Rockville units.

In January 2010, the City Council of Rockville voted to bring its condo and homeowners association under the jurisdiction of the County's Commission on Common Ownership Communities. The City of Gaithersburg is the only other major jurisdiction in the County that has not adopted this approach.



Source: COC licensing data provided by DHCA, Provided on October 10, 2010
OCP provided historical data.

Condo and Homeowner Associations National Statistics

Estimated number of U.S. association-governed communities and individual housing units and residents within those communities

Year	Communities	Housing Units	Residents
1970	10,000	701,000	2.1 million
1980	36,000	3.6 million	9.6 million
1990	130,000	11.6 million	29.6 million
2000	222,500	17.8 million	45.2 million
2002	240,000	19.2 million	48.0 million
2004	260,000	20.8 million	51.8 million
2006	286,000	23.1 million	57.0 million
2008	300,800	24.1 million	59.5 million
2009	305,400	24.4 million	60.1 million
2010	309,600	24.8 million	62.0 million
%Change (2006-10)	8%	8%	9%

Association-governed communities include homeowners associations, condominiums, cooperatives and other planned communities. Homeowners associations and other planned communities account for 52-55% of the totals above, condominiums for 38-42% and cooperatives for 5-7%.

Reproduced from the Community Associations Institute

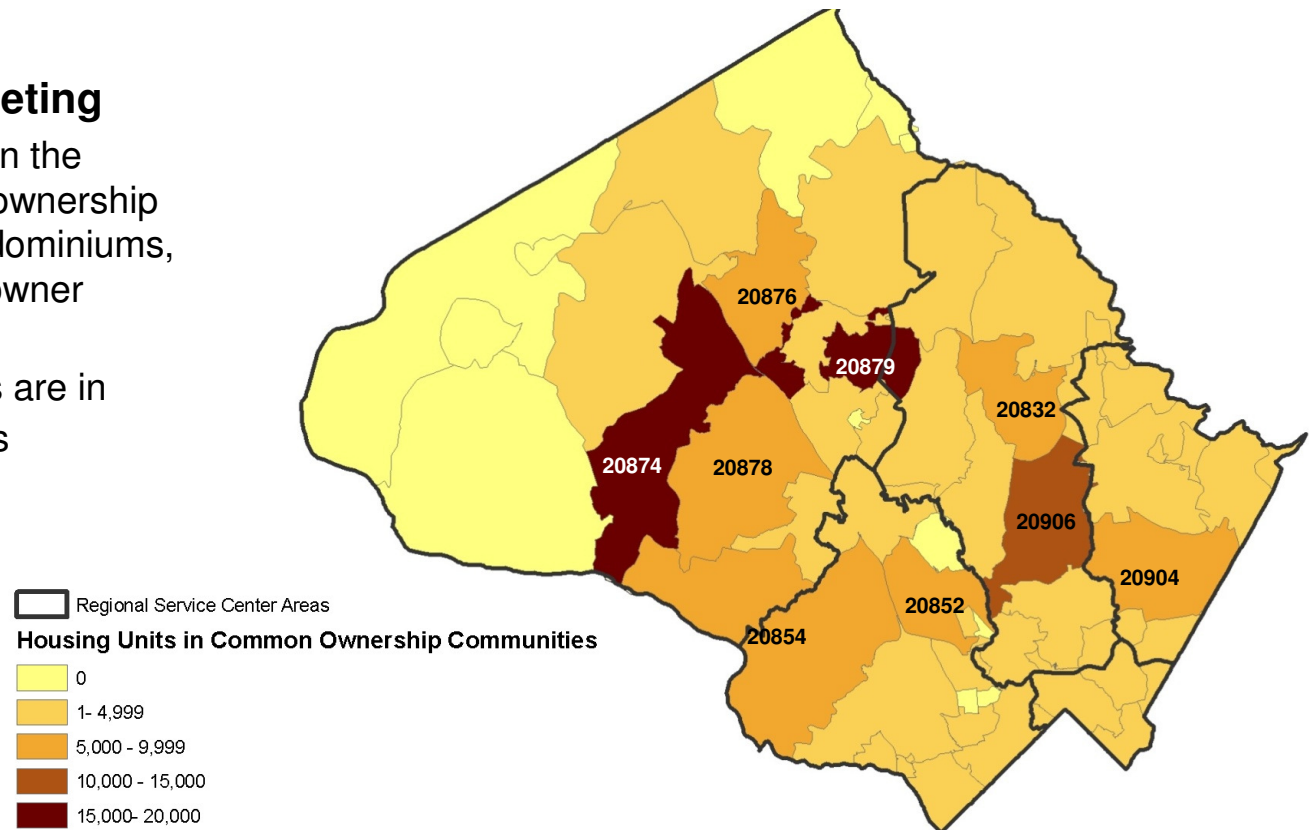
Data Source: Estimates based on U.S. Census publications, American Housing Survey (AHS), IRS Statistics of Income Reports, California and Florida state specific information, related association industry trade groups, and collaboration with industry professionals.



Condo and Homeowner Associations in Montgomery County

3/10/2009 CountyStat Meeting

- 33% of the housing units in the County are in a common ownership community (Includes condominiums, co-operatives, and homeowner associations)
- 14.3% of those COC units are in condominium associations



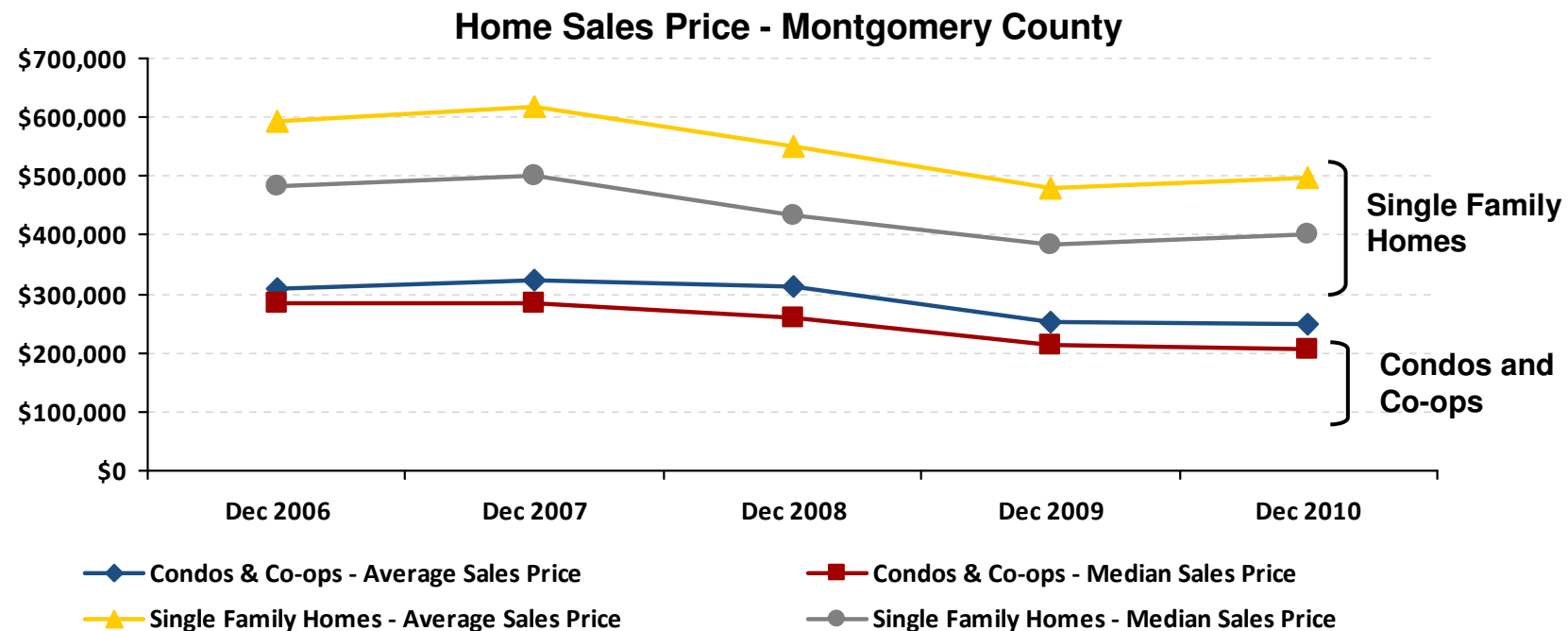
This map displays the concentration of housing units in common ownership communities in each zip code within the County.



Source: (3/10/2009 CountyStat Meeting) Data provided by DHCA, Map produced by CountyStat office

Market Statistics – Condos vs. Single Family Homes

Home Sales Price



Home Sales Price	Dec-06	Dec-07	Dec-08	Dec-09	Dec-10	% Change
Condos & Co-ops - Average Sales Price	\$310,319	\$324,695	\$312,720	\$253,236	\$247,274	-20%
Condos & Co-ops - Median Sales Price	\$284,000	\$285,000	\$260,000	\$212,250	\$207,000	-27%
Single Family Homes - Average Sales Price	\$593,801	\$617,367	\$552,139	\$480,831	\$495,736	-17%
Single Family Homes - Median Sales Price	\$485,000	\$500,000	\$435,000	\$385,000	\$400,000	-18%

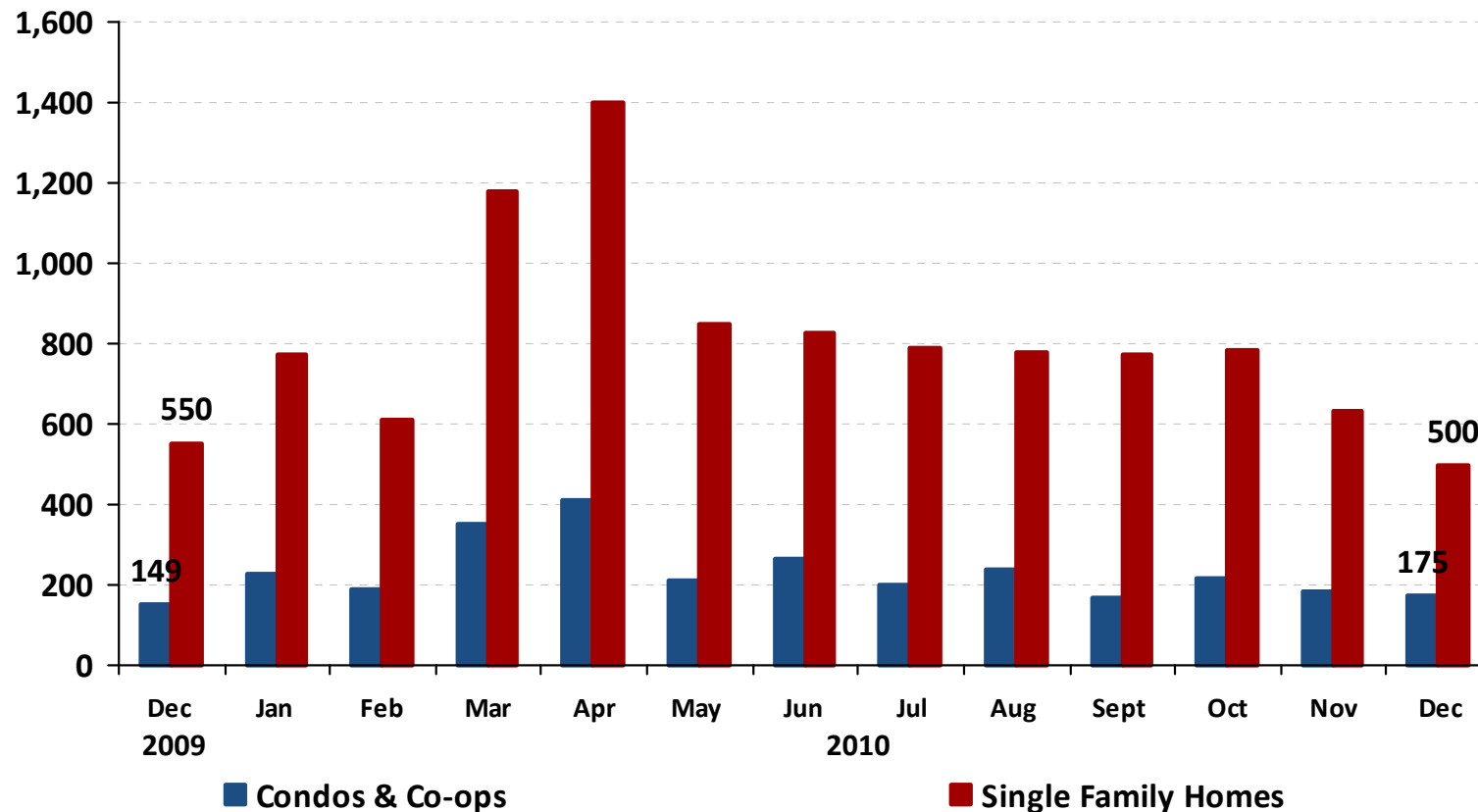
Reproduced from the Greater Capital Area Association of Realtors (GCAAR) Residential Market Report (December 2010)

Data Source: Metropolitan Regional Information Systems, Inc. (MRIS)



Market Statistics – Condos vs. Single Family Homes Sales Trend

Contracts Ratified Per Month – Montgomery County
(The term “sales” represents ratified purchase contracts.)



Reproduced from the Greater Capital Area Association of Realtors (GCAAR) Residential Market Report (December 2010)

Data Source: Metropolitan Regional Information Systems, Inc. (MRIS)



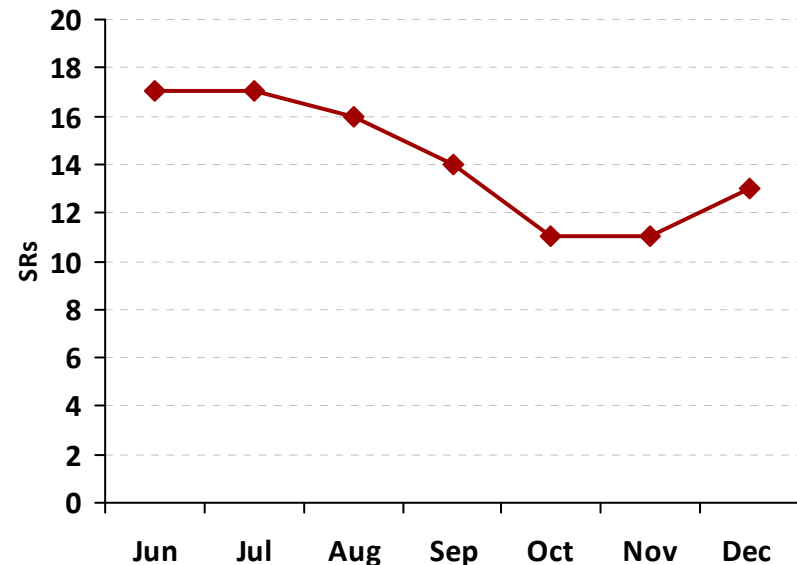
Condo and Homeowner Associations in Montgomery County MC311 Service Request Data

SRs – Office of Consumer Protection, Commission on Common Ownership Communities (CCOC)	Total SRs Jun-Dec 2010	% of Total Calls to OCP
Condo or homeowners associations complaints	99	14%

Key Points

- **Knowledge Base Article**
 - Callers are directed to the OCP-CCOC website
 - If the caller is not able to access the internet or needs further information, contact and complaint information is collected and the SR is forwarded to the department for resolution.
- **Consumer Protection and the CCOC still receive most of their calls thru direct dialing or emails; the department does not outsource exclusively to 311.**
 - For the CCOC, OCP estimates that the department received an additional 421 inquiries over the same 6-month period.

SRs, June-December 2010



Most of the calls to MC311 related to the CCOC concern how to file a complaint and what constitutes a complaint. Less than 10 SRs concerned condo/HOA fees.



Source: MC311, Siebel Call Center System; Data extracted on 1/26/2011

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Experiences of Managers/Association Presidents

Issues related to foreclosures and delinquency

CountyStat solicited information from 3 property managers and 1 association president, representing and/or managing over 40 common ownership communities.

Overview

- Delinquencies were referenced as the more significant problem, a homeowner might forego paying assessments for many months before any further action is taken (i.e. foreclosure proceedings)
 - Delinquencies were reported to range between none to greater than 30% in a community
 - High delinquency rates can result in less income for the COC, incursion of attorneys' fees in pursuing recompense, potentially higher assessments for remaining homeowners, postponement of repairs and potentially lower resale values for homeowners
- Foreclosures were more difficult to assess in terms of magnitude, as banks often did not inform the COC of impending actions or canceled actions

OCP staff to the Commission on Common Ownership Communities (CCOC) put CountyStat staff in contact with several managers and association presidents to get a better understanding of the difficulties the associations are in—their default rates, their foreclosure rates, the likelihood of any recovery of defaults, the costs of collection, etc.



Source: Data collected by CountyStat

Experiences of Managers/Association Presidents

Issues related to foreclosures and delinquency

Questions	1	2
What is your role in the COC	Association president (Condo and HOA)	Property manager
In what community is your COC located	Potomac, MD	18 properties all over Montgomery County
Describe your community from an economic perspective	Upscale, high end condos (\$ range from \$600s to over \$2 mil)	Varies (very high and very low)
Approximately how many units do you represent	153 units	>1,500 units
Approximately how many delinquencies is your COC experiencing	Very low 1 bankruptcy/ foreclosure. Current delinquency rate in Condo I is less than .5%.	Varies Range: 0 delinquencies to >20 percent, one community has a delinquency of over \$60,000
Approximately how many foreclosures is your COC experiencing	One to date with one pending	Yes, at least 5-10 are in the process overall, It is hard to tell, since the banks do not keep us informed; some times they schedule a foreclosure and then cancel it without explanation.



Source: Data collected by CountyStat

Experiences of Managers/Association Presidents

Issues related to foreclosures and delinquency

Questions	3	4
What is your role in the COC	Property Manager	Property Manager
In what community is your COC located	13 HOAs and 8 condos all over Montgomery County	4 HOAs and 3 condos all over Montgomery County
Describe your community from an economic perspective	Varies 2 communities with most issues are moderately priced (\$2-300k)	5 Middle class communities 2 Middle to upper class communities
Approximately how many units do you represent	>2,000 units	>800 units
Approximately how many delinquencies is your COC experiencing	Of the 2 communities with the most issues, one is currently at 14%, the other is at 16% after write-offs.	Ranges from 0-32%
Approximately how many foreclosures is your COC experiencing	Both of those 2 communities have between 8 and 10	Not answered



Source: Data collected by CountyStat

Assessments – Delinquent Payments

Issues related to foreclosures and delinquency

Assessments are the amount of money that each owner must pay to help meet the total expenses of the COC. Assessments cover such costs as the maintenance and repair of the buildings, parking lots, elevators, playgrounds, pools, and other common elements owned by the COC.

Options for COC to Recoup Lost Fees

- **Charge Fees & Penalties:** Most COC rules allow the COC to charge late fees and interest against owners who don't pay their assessments on time. These extra fees are added to the assessments due.
- **Withhold Benefits:** In addition, the rules may allow the COC to deny use of the common elements, such as swimming pools or parking, to those owners and even to cut off utility services covered by the assessments.
- **Legal Action:** The COC may also take legal action against the owners, and the rules might allow the COC to charge the owners with the costs of its attorney's fees if it does so.
- **Maryland Contract Lien Act:** Under this law, a COC can put a lien on an owner's property for nonpayment of assessments without going to court. All that is necessary is for the COC to give a 30-day warning. Once the COC has a lien, it can foreclose on the property.

Source: Commission on Common Ownership Communities, Assessments FAQ Brochure

Available on the web at:

<http://www.montgomerycountymd.gov/content/ocp/ccoc/assessmentsbrochure.pdf>



Assessments – Delinquent Payments

Issues related to foreclosures and delinquency

Taking legal action (e.g. foreclosure) against a homeowner is one option available to COCs to recoup delinquent fees. However, Maryland foreclosure protection laws apply to lien foreclosures in condos and HOAs.

- In 2010, Maryland enacted bank foreclosure homeowner protections
- These laws also apply to lien foreclosures in Condos and HOAs for unpaid assessments
- The authority for this comes from Real Property Article 14-204(a), part of the Maryland Contract Lien Act, which provides that:
 - “A lien may be enforced and foreclosed by the party who obtained the lien in the same manner, and subject to the same requirements as the foreclosure of mortgages and deeds of trust on property in this State containing a power of sale or an assent to a decree.”



Source: Maryland Office of the Attorney General
<http://www.oag.state.md.us/Consumer/foreclose.htm>

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Government Role in COC Assessments and Collection Local (1 of 2)

Montgomery County Commission on Common Ownership Communities (CCOC)

- *Chapter 10-B, Montgomery County Code:* The law created a Commission on Common Ownership Communities and an Office of Common Ownership Communities.
- The Commission and Office register all common ownership communities, offer a program to resolve disputes with adequate due process protections and to regulate elections, budget adoptions, and enforcement procedures. They also provide educational programs and technical assistance to unit owners and board members.
- The CCOC has limited authority around collection of delinquent payments.
- The CCOC does provide information related to available County foreclosure assistance in its newsletter (right).




Source: Commission on Common Ownership Communities

Government Role in COC Assessments and Collection Local (2 of 2)

COMMISSION ON COMMON OWNERSHIP COMMUNITIES
OFFICE OF CONSUMER PROTECTION
MONTGOMERY COUNTY, MARYLAND

We are on the Web—visit us at
www.montgomerycountymd.gov/ccoc

Summer 2009



CCOC Communicator

The Importance of Proper Elections

Inside this issue:

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By Arthur Dubin, Commissioner

Imagine your Board being stopped cold—unable to sign a vital contract or to implement that special assessment for critical repairs—until the last election is repeated and performed correctly.

This may sound extreme, but in recent years the CCOC has addressed a growing number of cases that focused on the proper election of a Board. Being with the CCOC has allowed us to see the differing and often creative ways by which community associations hold annual elections and address voting and proxies, and the cases that come to us often manifest at least one major flaw in the process that places the validity of the new Board—and all its actions—in dispute.

Most governing documents call for annual elections of Board members and spell out the process in some detail. By not following the requirements of your documents, or by failing to seek professional help answering important questions, the elections can later be called into question by any association member and possibly ruled invalid by the CCOC or a court. And even the existence of a legal challenge

can paralyze the new Board until it is finally resolved.

What can the Board do to avoid this? Begin with reading your governing documents. Then, if you have questions, consult a professional manager or attorney for answers and advice. Third, write an election plan that outlines all the different steps you have to take, create a time line or schedule, and draft a checklist to follow. It sounds simple, but if you take short cuts, or leave vague issues unresolved, you can create difficulties for community later.

Use notices that spell out the basic "S-W's and How:" who should get what type of notice, where and when should the notice be sent, why are you sending the notice, and how can the members reply, nominate, and vote in person or by proxy?

Ask for help from others with the project so that more attention can be paid to the details. If you know of disputes, try to work with the other parties to review the plans and reach agreement on them before the notices go out and the election held. Keep your records to simplify the process next

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CCOC Communicator

Summer, 2009

HOW THE COUNTY'S HOUSING DEPT. CAN HELP YOUR COMMUNITY

The Department of Housing and Community Affairs (DHCA) is one of the County's agencies that can be of direct assistance to communities and their members. DHCA operates a wide variety of housing programs, including the MPDU program, the Commission on Landlord-Tenant Affairs, Housing Code Enforcement, Weatherization Assistance and the financing of affordable housing.

DHCA can make grants and low-interest loans available to homeowners to help them finance basic improvements to their dwellings. Applicants must meet certain income guidelines in order to qualify.

Associations and members who have complaints about another member's failure to properly maintain his or her property (such as, by causing water leaks in a condominium or by refusing to repair flaking paint or a dilapidated fence) can make confidential complaints to DHCA's Housing Code Enforcement Unit. Likewise, a member who is concerned about the association's failure to fix a leak or to control a pest infestation (for example) can also make a confidential complaint to Code Enforcement. An inspector will visit the property and can issue a violation notice against the owner of the defect, and can file a court action if the violation is not corrected in the time given.

More information is available on DHCA's website at www.montgomerycountymd.gov/hca. The Housing Code Enforcement number is 240-777-3785. The other programs are available at 240-777-3600.

RECENT COURT RULINGS ON CCOC DECISIONS

Final CCOC decisions are legally binding unless reversed on appeal. Appeals must be made to the County Circuit Court within 30 days of the decision. If a party is unhappy with the Circuit Court's ruling it can appeal to the Court of Special Appeals and then to the Court of Appeals, Maryland's highest court.

Two recent CCOC decisions were reversed on appeal and a third was upheld. The best-known of the cases was #71-06, *Fiscina v. Devonshire East HOA*. In that case, the hearing panel found that the HOA had committed numerous violations of State law and of its governing documents, and ordered the HOA to pay the successful homeowner's legal fees. The HOA appealed the award of legal fees (but not the other rulings). The Circuit Court held that the language of the covenants did not clearly require the HOA to pay legal fees in a homeowner suit to enforce the covenants, and he reversed that part of the CCOC decision. The judge made his ruling orally and did not issue any written decision.

The Court of Special Appeals handed down another important (but not officially reported) decision in #30-06, *Masters v. Norbeck Grove Community Association*. In that case, the lot owner constructed a massive stone outdoor fireplace, and the dispute was over whether the HOA approved it. The evidence was clear that the owner never submitted detailed plans for the fireplace. Instead, he submitted detailed plans showing flower and other plantings, and claimed they included a small pencilled notation "stone fireplace." He also claimed to have discussed the proposed stone fireplace with a member of the architectural review committee. The HOA's witnesses testified that they did not recall seeing the notation on the plans, but they did not keep their copy of the plans. The CCOC did not rule on whether or not the "stone fireplace" notation was on the submitted plans, holding instead that the rules clearly required lot owners to submit detailed plans for all new construction and therefore the lot owner had no good reason to believe that the HOA

(continued on page 5)

County Assistance in Avoiding Foreclosure

Montgomery County is aware that many of its communities, especially condominium associations, are suffering from high rates of foreclosure and loss of assessment income. The County is responding in a variety of ways to deal with these problems.

- **Emergency financial assistance to homeowners.** The Department of Health and Human Services can provide temporary cash assistance to avoid foreclosures by paying part of the arrearages. Residents who need assistance should call HHS's Special Needs Housing Unit at 240-777-4565 or one of HHS's regional offices (Rockville: 240-777-4550/Silver Spring: 240-777-3075/Germantown: 240-777-4448).
- **Foreclosure prevention counseling.** Through the Department of Housing and Community Affairs (DHCA), the County has provided grants to several private agencies that offer free assistance on foreclosure prevention, including restructuring existing mortgage payments to make them more affordable. The Statewide information center is the Maryland HOPE Hotline at 1-877-462-7555. Regional agencies are: Rockville (Consumer Credit Counseling, 1-877-254-1097); Silver Spring (Latino Economic Development Corp., 1-866-977-5332 ext. 7434); Gaithersburg (Home Free USA, 301-891-6400); and Germantown (Housing Initiative Partnership, 301-699-0425).
- **Care of vacant properties:** DHCA's Housing Code Enforcement Unit will inspect vacant properties that are not being maintained and will board them up and take other actions to preserve them. Call 240-777-3785.
- **Emergency housing:** HHS also offers temporary housing for the homeless.
- **General information:** In addition to these agencies, general information on foreclosure avoidance and foreclosure law is available on State Senator Jamie Raskin's web site (<http://senatorjamiearaskin.com/files/Economic Assistance Guide.pdf>) and at People's Law (www.peoples-law.org). The CCOC encourages communities to distribute this information to all their members.



Source: Commission on Common Ownership Communities



Government Role in COC Assessments and Collection

State (1 of 2)

State of Maryland

Division of Consumer Protection, Office of the Attorney General
Maryland Homeowners Association Act
Maryland Contract Lien Act
Maryland Condominium Act

- The authority to collect COC assessments is recognized in Maryland law and is created by documents recorded in the land records (e.g. a declaration of covenants; a declaration with accompanying by-laws; articles of incorporation and a lease)
- The types of charges which a community association may collect include:
 - Annual assessments; Special assessments; Collection costs in connection with collecting delinquent assessments; Administrative costs in connection with collecting assessments; Late fees; Interest on delinquent assessments; Legal fees.
- A community association can only collect those charges which its documents specifically allow. If the documents do not allow late fees, then it cannot collect late fees unless it amends its documents. The same is true with interest, legal fees, collection costs and administrative costs.

The seller also has to provide certain information to a potential homeowner, including whether any fees are delinquent against the property and any pending claims, covenant violations actions, or notices of default against the property. The COC has to provide this information to the seller upon request.

Source: Maryland Annotated Code, Title 11-B
CCOC Manual (Montgomery County)

http://www.montgomerycountymd.gov/content/ocp/ccoc/pdf/final_draft_manual_9_09_05.pdf



Government Role in COC Assessments and Collection State (2 of 2)

State of Maryland

Department of Housing and Community Development Task Force on Common Ownership Communities (2006)

- Charged to study issues pertinent to common ownership communities, including education and training needs of common ownership community boards and prospective buyers; availability of alternative dispute resolution services, collecting assessments, resale of homes within common ownership communities.
- Under *Collection of Assessments*, the Task Force recommended:
 - Lien priority
 - Right to file an assessment escrow action
 - Statutory authority to institute policies for the suspension of privileges of delinquent unit owners

Maryland General Assembly Lien Priority Legislation

- Lien Priority has been brought up in legislation repeatedly (2010 - The Residential Association Sustainability Act) without passing successfully.
 - In the event of a foreclosure of a deed of trust, mortgage instrument, or an encumbrance recorded before a condominium's or homeowners association's lien, the respective lien has priority in an amount of up to four months of unpaid assessments and up to \$500 of related interest and fees
 - Supported by the County's CCOC

Source: Task Force on Common Ownership Communities (2006), Task Force Report
<http://www.msa.md.gov/megafile/msa/speccol/sc5300/sc5339/000113/003000/003160/unrestricted/20066534e.pdf>
MGA – Dept of Legislative Services, Fiscal and Policy Note
http://mlis.state.md.us/2010rs/fnotes/bil_0002/hb0842.pdf



Government Role in COC Assessments and Collection

Federal

Federal Government

Fair Debt Collection Practices Act

- There are Federal laws which govern the collection of assessments, in particular the Fair Debt Collection Practices Act.
- The Fair Debt Collection Practices Act defines the term “debt collector” and then proscribes collection tactics of debt collectors.
 - A debt collector is, broadly, anyone who regularly collects debts owed to another. When a debt collector contacts persons to locate a debtor, for example, the debt collector is not permitted to state that the debtor owes any debt, is limited to the number of times it can communicate with persons, may not communicate by postcard, and, after the debt collector knows that the debtor is represented by an attorney, must communicate through the debtor’s attorney.
 - A debt collector may not communicate at unusual times or places with a debtor. There are limits on communicating with third parties about the debt and on communicating with the debtor after the debtor has asked that communication cease. The statute addresses harassing or abusive conduct such as the use or threat of violence, the use of obscene or profane language, the publication of a list of debtors and engaging in annoying telephone calls.
- The statute also prohibits misleading representations, such as the threat to take any action that cannot be legally taken or that is not intended to be taken.

The Fair Debt Collection Practices Act only applies to collection agencies attempting to collect a debt. If the COC has not referred the debt to a collection agency the Maryland Debt Collection Law would apply to a COC directly attempting to collect money from a unit owner.



Source: CCOC Manual & Resource Guide (Montgomery County)
http://www.montgomerycountymd.gov/content/ocp/ccoc/pdf/final_draft_manual_9_09_05.pdf

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Recommendations

Improving Education for COCs, Homeowners and Potential Homeowners

CCOC Annual Forum

- The CCOC holds an annual forum geared towards homeowners and residents of common ownership communities in the County, as well as professionals who work with those communities.
- Part of this year's focus could be on providing information on how to deal with delinquencies and foreclosures in common ownership communities, and guidance for potential homeowners.

Develop Guidance to Potential Homeowners

- The Commission already provides informational resources on a number of topics on the County's website.
- It could develop additional guidance for potential homeowners on questions to ask when considering a home purchase in a COC (e.g. the community's delinquency rate).

Increase Distribution of Assessments Literature

- The Commission already provides informational resources on a number of topics on the County's website, including a brochure specifically on assessments.
- OCP could work to distribute this literature more widely, either electronically, or in hard copy with sufficient funds.



Recommendations

Improving Education for COCs, Homeowners and Potential Homeowners

Meet with Realtors Association

- OCP could meet with the Realtors Association to educate realtors about their duties to have sellers provide financial information to buyers
- This would ensure that their clients who are selling condos or HOAs are aware of their obligation to provide the resale disclosure package
- This would also to ensure that their clients who are purchasing condos or homes in HOAs are aware of their right to demand the package from the sellers

Add Information on COC Assessments to MPDU Workshops

- DHCA could provide information regarding COC assessments in its MPDU training sessions.
- Just because an individual qualifies for a MPDU does not necessarily mean the homeowner can afford to pay future assessments and COC fees.



Wrap-up

- Follow-up

